

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

V.

VLADISLAV KLYUSHIN
Defendant

CRIMINAL NO. 21-cr-10104-PBS

FORMALLY RENEWED WRITTEN MOTION FOR ACQUITTAL

At the Court's suggestion, defendant Vladislav Klyushin formally renews in writing his oral Fed. R. Crim. P. 29(a) motion for judgment of acquittal, made at the close of the government's case and renewed at the close of all evidence, on the grounds that the evidence, viewed most favorably to the government, failed to establish (a) any and all elements of the charged offenses beyond a reasonable doubt, (b) the same single conspiracy alleged in the indictment and (c) venue in this District.

Respectfully submitted,

Vladislav Klyushin,
By His Attorneys,

/s/ Maksim Nemtsev
Maksim Nemtsev, Esq.
Mass. Bar No. 690826
20 Park Plaza, Suite 1000
Boston, MA 02116
(617) 227-3700
menemtsev@gmail.com

/s/ Marc Fernich
 Marc Fernich
 Law Office of Marc Fernich
 800 Third Avenue
 Floor 20
 New York, NY 10022
 212-446-2346

Email: maf@fernichlaw.com

Dated: Feb. 14, 2023

CERTIFICATE OF SERVICE

I, Maksim Nemtsev, hereby certify that on this date, January 14, 2023, a copy of the foregoing documents has been served via Electronic Court Filing system on all registered participants.

/s/ Maksim Nemtsev
Maksim Nemtsev